

**IN THE UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

NEETA THAKUR, on behalf of themselves and all
others similarly situated, *et. al*,

Plaintiffs-Appellees,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, *et al.*,

Defendants-Appellants.

No. 25-4249

ASSENTED TO MOTION TO RESCHEDULE ORAL ARGUMENT

The United States respectfully moves for an order rescheduling oral argument, which is currently scheduled for November 14 at 1pm PST. In support of this motion, the United States further states as follows:

1. Undersigned counsel is the Principal Deputy Assistant Attorney General for the Civil Division, and previously argued this case at the stay posture on July 31, 2025. On September 18, 2025, the Clerk issued a notice scheduling this case for fully remote oral argument on November 14, 2025, at 1pm PST.

2. Due to the time difference, the scheduled argument will extend into undersigned counsel's religious Sabbath, which begins at sundown on November 14, 2025, at 4:36pm EST.

3. The United States therefore respectfully requests that the Court reschedule oral argument. Undersigned counsel has conferred with counsel for appellees, who confirmed that appellees would consent to the argument being rescheduled to an earlier time on November 14, or any time on November 13, 2025. Of course, if the Court is unable to accommodate this request, another attorney will handle the argument for the government.

Respectfully submitted,

/s/ Yaakov M. Roth

YAAKOV M. ROTH

*Principal Deputy Assistant Attorney
General*

Civil Division

U.S. Department of Justice

950 Pennsylvania Avenue NW

Washington, DC 20530

yaakov.m.roth@usdoj.gov

September 25, 2025

CERTIFICATE OF COMPLIANCE

This motion complies with the type-volume limit of Federal Rule of Appellate Procedure 27(d)(2)(A) because it contains 179 words, excluding those portions exempted by Rule 32(f). It also complies with the typeface and type-style requirements of Federal Rule of Appellate Procedure 27(d)(1)(E) because it was prepared using Word for Microsoft 365 in Century Schoolbook 14-point font, a proportionally spaced typeface.

/s/ Yaakov M. Roth
Yaakov M. Roth

CERTIFICATE OF SERVICE

I certify that on September 25, 2025, I filed and served the foregoing document with the Clerk of the Court by causing a copy to be electronically filed via appellate case management system. I also hereby certify that the participants in the case are registered ACMS users and will be served via ACMS.

/s/ Yaakov M. Roth
Yaakov M. Roth